

FEDERAL PUBLIC DEFENDER
DISTRICT OF NEW JERSEY

RICHARD COUGHLIN
FEDERAL PUBLIC DEFENDER

1002 BROAD STREET
NEWARK, NEW JERSEY 07102

CHESTER M. KELLER
FIRST ASSISTANT

(973) 645-6347 Telephone
(973) 645-3101 Facsimile
(973) 297-4807 Facsimile

September 13, 2013

Honorable William H. Walls
United States District Judge
Martin Luther King, Jr., Federal Bldg. & Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Fabio Vargas Moreno and Linda Yarleque
Docket No. 13-00096

Dear Judge Walls,

Defense motions in this matter are currently due on Monday, September 16, 2013.

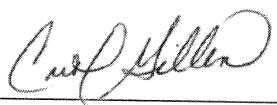
Defense counsel requests a 30-day extension of time in which to file motions in this matter. Additional time is needed because of the voluminous discovery involved and counsel's simultaneous preparation for another trial.

Additional time will also allow for an additional attorney from this office (First Asst. Chester M. Keller) to properly prepare and assist in the defense.

Peter Willis, Esq. joins co-counsel in this request for an extension of time.

Assistant United States Attorney Rachel Honig does not object to a 30-day adjournment in this matter.

Your Honor's consideration of this request is much appreciated.



Carol Gillen,
Asst. Federal Public Defender

cc: Rachel Honig, A.U.S.A. (via e-mail)
Peter Willis, Esq. (via e-mail)